

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE: TERRORIST ATTACKS ON :
SEPTEMBER 11, 2001 : MDL 03-1570 (GBD)(SN)**

This Document Relates To:

Havlish, et al. v. bin Laden, et al., Case No. 03-CV-09848
Ashton, et al. v. al Qaeda Islamic Army, et al., Case No. 02-CV-06977
Burnett, Sr., et al., v. Islamic Republic of Iran, Case No. 15-CV-9903
Burlingame, et al. v. bin Laden, et al., Case No. 02-CV-07230
Bauer, et al. v. al Qaeda Islamic Army, et al., Case No. 02-CV-07236
O'Neill, Sr., et al. v. Republic of Iraq, et al., Case No. 04-CV-1076
Federal Insurance Co., et al. v. al Qaida, et al., Case No. 03-CV-06978

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All other cases against the Islamic Republic of Iran

**HAVLISH PLAINTIFFS' PROPOSED COMBINED SET OF
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS ADDRESSED TO THE
PLAINTIFFS' EXECUTIVE COMMITTEE FOR
WRONGFUL DEATH AND PERSONAL INJURY CLAIMS**

The *Havlish* Plaintiffs, by and through their counsel, present the following Combined Interrogatories and Requests for the Production of Documents to the Plaintiffs Executive Committee for Wrongful Death and Personal Injury Claims. These Discovery Requests are propounded in furtherance of the Court's Opinion and Order of September 30, 2019 (Doc. 5180). Please respond to each Discovery Request in accordance with the Federal Rules of Civil Procedure.

DEFINITIONS

1. “Communication” means any disclosure, transfer, or exchange of information or opinion, however made.
2. “Identify” and “describe,” unless otherwise noted:
 - (a) When used in reference to a communication means to state or identify the form of communication (e.g., telephone conversation, letter, written memorandum, face-

to-face conversation or any other form or medium); the date of communication; the person(s) to whom the communication was made and the person(s) who initiated it; the substance of the communication; and the name and address of the custodian of any written communication or written memorialization or other recording of the communication.

(b) When used in reference to a document means to state or identify the type of document, date, author, addressee, title, its present location, its present custodian and the substance of its contents. You may produce a copy of the document in lieu of identification if doing so allows the recipient to determine all of the information set out above.

3. “You” and “your” mean the Plaintiffs Executive Committee for Wrongful Death and Personal Injury Claims (the “PEC”), and counsel in each of the following claims: *Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-CV-06977; *Burnett, Sr., et al., v. Islamic Republic of Iran*, Case No. 15-CV-9903; *Burlingame, et al. v. bin Laden, et al.*, Case No. 02-CV-07230; *Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-CV-07236; *O’Neill, Sr., et al. v. Republic of Iraq, et al.*, Case No. 04-CV-1076; *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03-CV-06978.

4. “Motion for Reconsideration” means the Motion for Reconsideration and/or Clarification of Decision Establishing A Common Benefit Fund Solely In Favor of *Havlish* Counsel, Doc. No. 5361.

5. USVSST Fund means the United States Victims of State Sponsored Terrorism Fund referenced in your Motion for Reconsideration.

DISCOVERY REQUESTS

1. With reference to representations made by you at footnote no. 12 in your Motion for

Reconsideration, please identify and describe the “significant common benefit work” that you “contributed” and was “ultimately utilized in the *Havlish* motion for default judgment.”

2. For each item of common benefit work identified in Discovery Request No. 1, please:

(a) explain how and when your work product was communicated and/or delivered to *Havlish* Counsel;

(b) identify and produce copies of any communication between you and *Havlish* Counsel related to that work product; and

(c) produce records of time and expenses incurred in the development of that work product.

Date: _____

/s/ Timothy B. Fleming
Timothy B. Fleming (DC Bar No. 351114)
WIGGINS CHILDS PANTAZIS
FISHER GOLDFARB, PLLC
1211 Connecticut Avenue, N.W., Suite 420
Washington, DC 20036
(202) 467-4489

Dennis G. Pantazis (AL Bar No. ASB-2216-A59D)
WIGGINS CHILDS PANTAZIS
FISHER GOLDFARB, LLC (*Lead Counsel*)
The Kress Building
301 19th Street North
Birmingham, AL 35203
(205) 314-0500

Attorneys for the *Havlish* Plaintiffs